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7 UNITED STATES OF AMERICA

8
9 **UNITED STATES DISTRICT COURT**
SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA) Criminal Case No. 08-CR-1071-L
11) Plaintiff,) DATE: June 5, 2008
12 v.) TIME: 2:00 p.m.
13 JOSE MIGUEL RODRIGUEZ,)
14)
Defendant.)
15 _____)

**NOTICE OF MOTION AND
MOTION TO FORFEIT BAIL**

16 TO: W. SAMUEL HAMRICK, JR., CLERK OF THE COURT, AGENT FOR THE
17 OBLIGORS; THE MATERIAL WITNESS, VANESSA GUZMAN-SANDOVAL, HER
ATTORNEY, GAYLE MAYFIELD-VENIERIS, AND THE SURETY, ARTURO
DELGADO LOPEZ

18 PLEASE TAKE NOTICE that pursuant to Rule 46(f)(1), Federal Rules of Criminal
19 Procedure, plaintiff, United States of America, will bring a motion to forfeit bail on for hearing before
20 this court in the courtroom of the Honorable William McCurine, Jr., United States Magistrate Judge,
21 United States Courthouse, 940 Front Street, San Diego, California, on June 5, 2008 at 2:00 p.m. or as
22 soon thereafter as counsel can be heard.

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1 The United States hereby moves this court to enter judgment against the above-named
2 material witness VANESSA GUZMAN-SANDOVAL and surety ARTURO DELGADO LOPEZ, in
3 the sum of \$5,000.00 upon a bond, a copy of which is attached hereto as Exhibit 1.

4 The aforesaid bond was executed by material witness, VANESSA GUZMAN-SANDOVAL
5 and ARTURO DELGADO LOPEZ, as a surety in the sum of \$5,000.00 conditioned upon the material
6 witness' appearance set forth in the bond.

7 On May 1, 2008 material witness, VANESSA GUZMAN-SANDOVAL failed to surrender
8 as ordered to immigration authorities. She failed to surrender and has not contacted immigration
9 authorities.

10 The United States also asks the Court to issue a no bail warrant for the arrest of material
11 witness, VANESSA GUZMAN-SANDOVAL.

12 This motion is based upon the pleadings, records and proceedings in this cause, together with
13 these motion papers.

10 DATED: May 23, 2008.

s/A. Dale Blankenship
A. DALE BLANDKENSHIP
Assistant United States Attorney
Attorneys for Plaintiff,
United States of America

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA) Criminal Case No. 08-CR-1071-L
Plaintiff,) CERTIFICATE OF SERVICE
v.)
JOSE MIGUEL RODRIGUEZ,)
Defendant.)
_____)

IT IS HEREBY CERTIFIED THAT:

I, A. Dale Blankenship, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the **Notice of Motion and Motion to Forfeit Bail** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

1. **Paul D. Turner** ptlaw@cox.net
2. **Gayle J Mayfield-Venieris** federal@mayfield-law.com

I hereby certify that I have caused to be mailed the foregoing, by the United States Postal Service, to the following non-ECF participants on this case:

1. VANESSA GUZMAN-SANDOVAL
14128 Lanark St.
Van Nuys, CA 91402
2. ARTURO DELGADO LOPEZ
14128 Lanark St.
Van Nuys, CA 91402

The last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 23, 2008.

s/ *A. Dale Blankenship*
A. Dale Blankenship